

**ORIGINAL**

**CRITICAL FILE**  
**ILLINOIS COMMERCE COMMISSION**  
Capt Robert C. Cottrell, Jr.  
APLSA/ULT  
Utility Litigation Team  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319  
(850) 283-6350  
Date Submitted: 17 January 2003

**ILLINOIS**  
**COMMERCE COMMISSION**  
2003 JAN 31 P 2:18  
CHIEF CLERK'S OFFICE

**BEFORE THE ILLINOIS COMMERCE COMMISSION**

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<b>Proposed General Increase in</b>	)	<b>Docket No. 02-0690</b>
<b>Water and Sewer Rates</b>	)	
	)	<b>MOTION FOR LEAVE TO</b>
	)	<b>INTERVENE</b>

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Now comes the United States Executive Agencies ("USEA"), by and through its counsel, Captain Robert C. Cottrell, Jr., and pursuant to Ill. Admin. Code tit. 83 § 200.200, respectfully requests that the Commission grant this Motion for Leave to Intervene.

In support thereof USEA states:

1. That under Docket No. 02-0690, Illinois-American Water Company (IAWC) has applied to the Illinois Commerce Commission for an order authorizing a general increase in its rates and charges for water and sewer service in the state of Illinois.
2. That USEA operates a large facility, Scott AFB, within the service territory of IAWC affected by this proposed rate increase.
3. That this facility currently receives water and sewer service from IAWC.
4. That the rates paid by USEA for water and sewer service are likely to be affected by the outcome of this proceeding.
5. That USEA has a substantial interest in this proceeding.

6. That USEA intends to work closely with the Illinois Industrial Water Consumers (IIWC), a current intervenor in this docket, but due to the restrictions placed upon the Federal Government as a result of sovereign immunity cannot be adequately represented by any other party.

7. That USEA agrees to accept service by electronic means in accordance with Ill. Admin. Code tit. 83 § 200.1050.

8. That USEA is represented by Capt Robert C. Cottrell, Jr. – a Judge Advocate admitted to the Georgia State Bar (GA Bar # 190119) as well as admitted to practice before various Federal courts. That Capt Cottrell is a member of the Air Force Utility Litigation Team that is responsible for representing Air Force interests in utility proceedings worldwide.

Wherefore, USEA prays that the Commission grant it the following relief:

A. That it be granted Leave to Intervene in and become a party to this proceeding;

B. That, in accordance with Ill. Admin. Code tit. 83 § 200.200(b), USEA be granted permission to participate in any proceedings pending a formal decision on this motion.

C. That, in accordance with Ill. Admin. Code tit. 83 § 200.90(a), USEA's counsel, not a member of the Illinois Bar, be granted special leave to enter an appearance and be heard.

D. That the following be added to the service list in this proceeding:

Capt Robert C. Cottrell, Jr.  
AFLSA/ULT  
Utility Litigation Team  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319  
(850) 283-6350  
Fax: (850) 283-6219  
[Robert.Cottrell@tyndall.af.mil](mailto:Robert.Cottrell@tyndall.af.mil)

E. That the Commission grant such other relief as it deems appropriate.

Respectfully submitted,

UNITED STATES EXECUTIVE AGENCIES

A handwritten signature in black ink, reading "Robert C. Cottrell, Jr.", written over a horizontal line.

Captain Robert C. Cottrell, Jr.

Utility Litigation Team

General Litigation Division

139 Barnes Drive, Suite 1

Tyndall AFB, FL 32403-5319

(850) 283-6350

Dated: 30 Jan 03

BEFORE THE ILLINOIS COMMERCE COMMISSION

Proposed General Increase in  
Water and Sewer Rates

)  
)  
)  
)

Docket No. 02-0690

MOTION FOR LEAVE TO  
INTERVENE - VERIFICATION

I, Robert C. Cottrell, Jr., being duly sworn, depose and state that I have read the foregoing Motion for Leave to Intervene on behalf of the United States Executive Agencies, and state the contents therein are true and accurate to the best of my knowledge and belief.



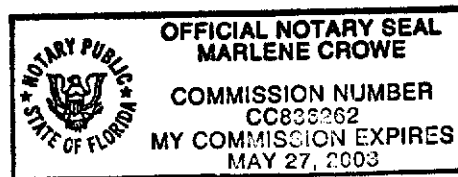
Captain Robert C. Cottrell, Jr.  
Utility Litigation Team  
General Litigation Division  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319  
(850) 283-6350

Dated: 30 Jan 03

SUBSCRIBED AND SWORN to me, a Notary Public on this 30th day of January 2003.  
by ROBERT C. COTTRELL, JR. (ID: Military ID Card)



Notary Public MARLENE CROWE



**BEFORE THE ILLINOIS COMMERCE COMMISSION**

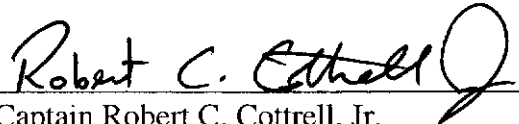
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**Proposed General Increase in  
Water and Sewer Rates**

) **Docket No. 02-0690**  
)  
) **MOTION FOR LEAVE TO**  
) **INTERVENE – PROOF OF**  
) **SERVICE**

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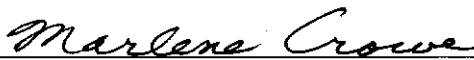
I, Robert C. Cottrell, Jr., being an attorney admitted to practice in the State of Georgia as well as various Federal (including Military) courts and counsel for the United States Executive Agencies herewith certify that I did on the 17<sup>th</sup> day of January 2003, by mail and electronically file with the Illinois Commerce Commission a Motion for Leave to Intervene on behalf of the United States Executive Agencies, and serve upon the persons identified in the attached service list, by depositing the same in the United States mail, in Panama City, Florida, with postage fully prepaid thereon.



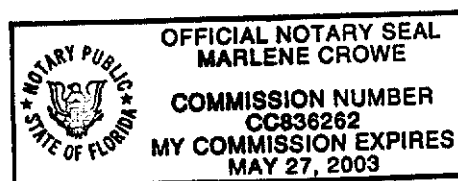
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SUBSCRIBED AND SWORN to me, a Notary Public on this 30th day of January 2003.  
by ROBERT C. COTTRELL, JR. (ID: Military ID Card)



Notary Public      MARLENE CROWE



**BEFORE THE ILLINOIS COMMERCE COMMISSION**

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**Proposed General Increase in  
Water and Sewer Rates**

)     **Docket No. 02-0690**  
)  
)     **MOTION FOR LEAVE TO**  
)     **INTERVENE – SERVICE LIST**

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